

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

v.

LAWNS UNLIMITED LTD. and  
EDWARD FLEMING,

Defendants.

Civ. No. 05-495-JJF  
Judge Joseph J. Farnan Jr.

2007 APR 13 PM 1:26

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

**PLAINTIFF'S MOTION TO COMPEL CANCELLATION OF PLAINTIFF'S  
DEPOSITION**

Plaintiff hereby moves this Court to order cancellation of Plaintiff's deposition on April 20, 2007 until decision has been made on the Protective Order that Defendants have filed. Plaintiff relies on the following in support of her motion:

1. Plaintiff requested and was unreasonably refused a neutral location for the taking of her own deposition and threatened sanction of Defendant's attorney fees.
2. To no avail, Plaintiff repeatedly attempted to schedule Defendant Fleming's deposition with Defendant's prior counsel. [DL 24, 27, 28 and 30]
3. Plaintiff has since proposed two separate dates to Defendant Fleming's current counsel and subsequently advised of Defendant's unavailability.
4. Defendants filed Protection Order that is pending. Plaintiff feels due to lack of cooperation on Defendants part, deposition on their part will not happen.
5. Cutoff for the taking of depositions is June 1, 2007.

WHEREFORE, Plaintiff prays this Court enter an Order granting Plaintiff's Motion to Compel the cancellation of Plaintiff's deposition.

A handwritten signature in black ink, reading "Renee Butz", is written over a horizontal line.

Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff *pro se*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion To Compel Cancellation of Plaintiff's Deposition were sent by first-class United States mail, postage duly paid, on this 13 day of April, 2007, to counsel of record as follows:

Margaret M. DiBianca  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building, 17<sup>th</sup> Floor  
1000 West Street  
Wilmington, DE 19801

  
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Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 4/13/07